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November 15, 2018

The Honorable Leonard P. Stark
United States District Court
For the District of Delaware
844 North King Street
Wilmington, DE 19801

*VIA ELECTRONIC FILING
& HAND DELIVERY*

Re: *H. Lundbeck A/S v. Apotex Inc. et al.*, C.A. No. 18-88 (Consol.) (LPS)

Dear Chief Judge Stark:

Plaintiffs and Defendant Sigmapharm Laboratories, LLC (“Sigmapharm”) write to request the scheduling of a discovery teleconference pursuant to Paragraph 8.m of the Scheduling Order.

Counsel for the parties held a verbal meet-and-confer by telephone on October 31, 2018. The following attorneys participated in that meet-and-confer:

For Plaintiffs:

Delaware Counsel: Megan Dellinger of Morris, Nichols, Arsht & Tunnell LLP
Lead Counsel: Brianne Bharkhda and Allison Schmitt of Covington & Burling LLP

For Sigmapharm:

Delaware Counsel: Jack Phillips of Phillips, Goldman, McLaughlin & Hall, P.A.
Lead Counsel: Marc Wezowski of Husch Blackwell LLP

Further, the parties exchanged written correspondence regarding this dispute on at least September 17, September 25, October 3, and November 8.

The dispute requiring judicial attention concerns:

1. Whether Sigmapharm is required to produce an unredacted copy of its Drug Master File to Plaintiffs.

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Respectfully,

/s/ Megan E. Dellinger

Megan E. Dellinger (#5739)

cc: Clerk of Court (via hand delivery)
All Counsel of Record (via electronic mail)